



First Love Ministries

P. O. Box 11007 • Yakima, WA 98909

February 7, 1994

William Caton
Acting Secretary
Federal Communication Commission
1919 M Street, N.W.
Room 222
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
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Rev. Victor Penz

Capt. Bob Regimbal

Dear Mr. Secretary:

Enclosed are the original and five copies of a request for a Proposed Rulemaking to assign FM Channel 254A to Mabton, Washington.

Please address all inquiries to the undersigned.

Very truly yours,

Douglas N. Earp
Director
First Love Ministries, Inc.
P.O. BOX 10
Mabton, WA. 98935

DNE/kw

Enclosures:

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First Love Ministries

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William Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20036

February 7, 1994

In Re: Petition for Rulemaking

Dear Mr. Caton,

On behalf of First Love Ministries, Inc. it is hereby requested that the Commission amend Section 73.202(b) of the Rules and Regulations by the following:

Community
Mabton, Washington

Channel
Present: None
Proposed: 254A

Mabton, Washington has a population of 1,482 according to the U.S. Census report data. Mabton is a small community located SE of Toppenish on Route 22, Yakima County, with no FM stations or assignments allocated. Channel 254A can be assigned to Mabton with no site restrictions. Mabton has its own school and a local governing body. It would be in the public interest to assign Channel 254A to Mabton as its first radio allocation.

These comments are filed on behalf of First Love Ministries Inc. in support of the above request. In the event that the FCC makes this proposed FM assignment to Mabton, First Love Ministries Inc. will apply for the facility.

Copies of comments should be directed to the following:

First Love Ministries, Inc.
P.O. BOX 10
Mabton Washington 98935

Thank you for your consideration in this matter.

Sincerely,

Douglas N. Earp
Director
First Love Ministries, Inc.

DNE/kw

Yakima Office
(509) 248-7777

Ranch Office
(509) 894-4659

Pasco Office
(509) 546-7777



Revelation 2:4

DECLARATION

ENGINEERING STATEMENT

Prepared For
First Love Ministries, Inc.
Mabton, Washington

Thomas J. Johnson says that he is an engineer and Vice President of Lechman & Johnson, Inc., Telecommunications Consultants, with offices located at 16201 Trade Zone Avenue, Suite 106, Upper Marlboro, Maryland, and that his qualifications are a matter of record with the Federal Communications Commission.

That the firm of Lechman & Johnson, Inc. has been retained by First Love Ministries, Inc. to prepare this Engineering Statement in support of a Petition for Rule Making to amend the Table of FM Assignments, Section 73.202(b), to allocate Channel 254A to Mabton, Washington. It is proposed to amend the Table of FM Assignments as follows:

<u>Community</u>	<u>Present Allocation</u>	<u>Proposed Allocation</u>
Mabton, Washington	-	254A

A channel study was made to determine whether a channel could be found which would comply with the Commission's minimum separation requirements of Section 73.207 of the Rules and Regulations. This study showed that Channel 254A would meet these separation requirements. The reference coordinates relied upon are as follows:

North Latitude: 46° 13' 10"
West Longitude: 120° 00' 17"

Table I is a list of existing stations, applications, allocations and proposed rule makings of co-channel and adjacent channel assignments pertinent to allocating Channel 254A to Mabton, Washington. The tabulation of distances shown in this Table were calculated by the methods prescribed in Section 73.208 of the Commission's Rules and Regulations, using the above reference point.

A Class A facility may operate with maximum facilities of 6 kW ERP and antenna HAAT of 100 meters. With these facilities, the predicted distance to the 70 dBu (principal community) contour will extend to a distance of 16.1 kilometers.

LECHMAN & JOHNSON, INC.

Declaration - First Love Ministries, Inc.

Thomas J. Johnson

Page Two

Section 73.315(a) of the FCC Rules and Regulations requires that the 70 dBu contour must encompass the boundaries of the principal community to be served. The reference coordinates of Mabton are 46° 12' 42" N/ 120° 00' 18" W, which is located 0.85 km from the proposed site. There is no terrain obstruction to the city of Mabton. Therefore, the proposed operation will provide the requisite coverage to Mabton, Washington in accordance with the provisions of Section 73.315 (a) & (b) of the FCC Rules and Regulations.

The town of Mabton is located in Yakima county and has a 1990 population of 1,482 persons.

Figure 1 is a map which shows the community of license, the reference site and surrounding terrain features.

The results of these studies show that Channel 254A can be assigned to Mabton, Washington consistent with the requirements of the Commission's Rules and Regulations.

I declare under penalty of perjury that the foregoing is true and correct.

LECHMAN & JOHNSON, INC.



Thomas J. Johnson
Telecommunications Consultant
February 3, 1994

LECHMAN & JOHNSON, INC.

TABLE I

LECHMAN AND JOHNSON, INC.
16201 TRADE ZONE AVENUE, SUITE 106
UPPER MARLBORO, MARYLAND 20772

SEPARATION STUDY

MABTON, WASHINGTON

Channel 254A 046-13-10 / 120- 0-17 erp : 6.000 kw eah : 100 m

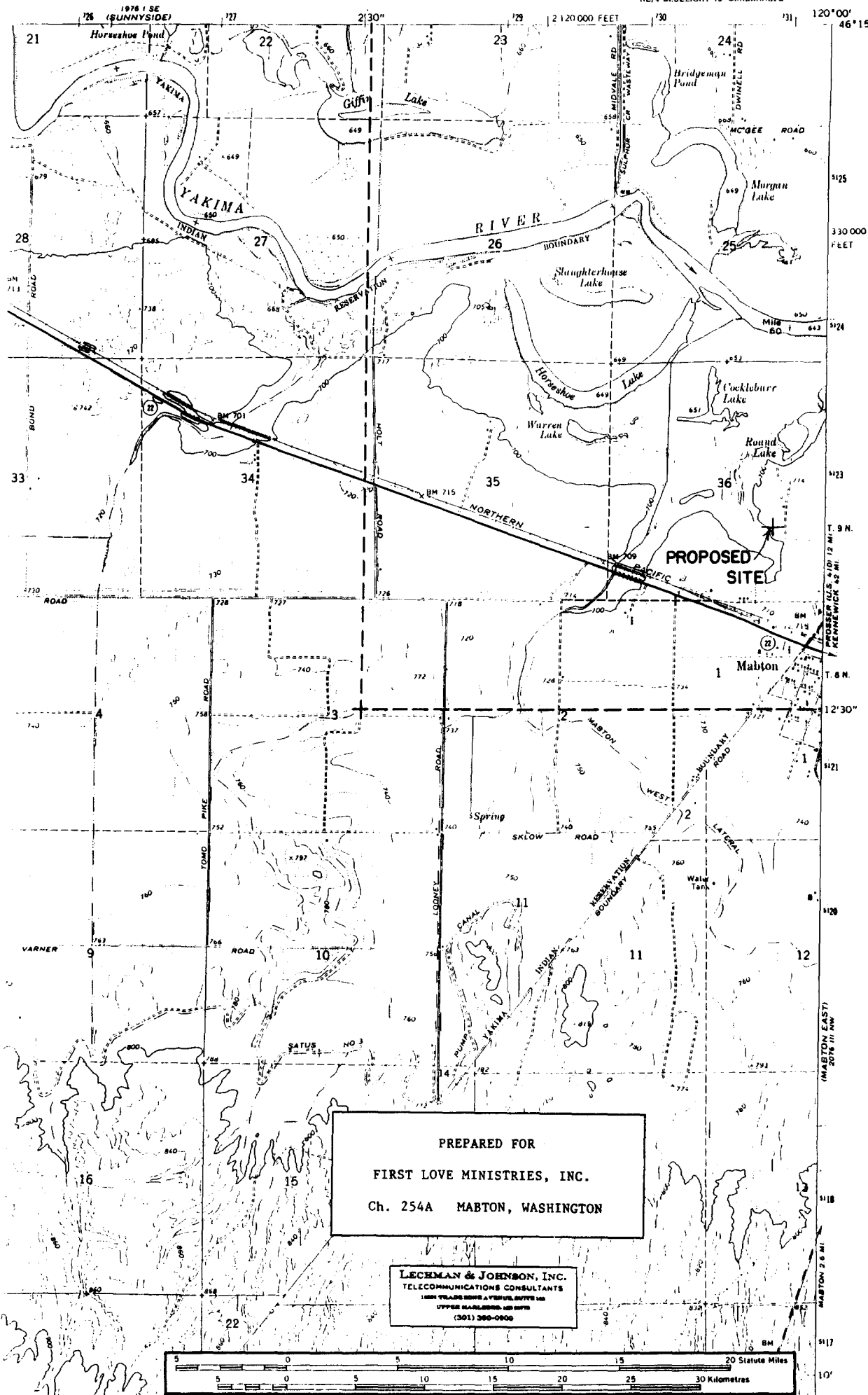
Designation	Channel (MHz)	Pertinent Allocation or Authorized Station	Separation Actual	(km) Required
Co-channel	254C2 (98.7)	KUBQ, La Grande, OR BPH-920702JC 045-26-26 / 117-53-31 2.25 kw / 592 m bearing from proposed = 117.12 deg	185.60 CLEAR (166 19.60 km)
2nd Adjacent	252A (98.3)	KRSE, Yakima, WA BLH-7495 046-31-49 / 120-27-15 0.70 kw / 171 m bearing from proposed = 315.23 deg	48.88 CLEAR (31 17.88 km)
3rd Adjacent	257A (99.3)	KZTAFM, Yakima, WA BLH-851028KH 046-31-53 / 120-26-58 0.63 kw / 180 m bearing from proposed = 315.63 deg	48.72 CLEAR (31 17.72 km)

END OF STUDY

LECHMAN & JOHNSON, INC.

MABTON WEST QUADRANGLE
WASHINGTON-YAKIMA CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
NE/4 BLUELIGHT 15 QUADRANGLE

GRANDVIEW



PREPARED FOR
FIRST LOVE MINISTRIES, INC.
Ch. 254A MABTON, WASHINGTON

LECHMAN & JOHNSON, INC.
TELECOMMUNICATIONS CONSULTANTS
1000 YEARS BONE AVENUE, SUITE 100
UPPER MERIDEN, MD 20866
(301) 380-0900

